

In the Matter Of:

In Re: LTL Management, LLC

ADAM PULASKI

June 14, 2023



Page 21

1 **thousand cases open within your office**
2 **relating to talc, in which your firm is lead**
3 **counsel, have you run any reports recently to**
4 **gain an understanding as to the nature of the**
5 **injuries claimed by those claimants?**
6 A. Again, it's difficult to run a
7 report because it has to be run from six
8 different places, and it's not all housed in
9 one area right now.
10 So, what I can tell you is that I
11 believe -- 9,000 cases are closed. Which
12 means we rejected it for one reason or
13 another. Or it was rejected by counsel we are
14 joint venturing with.
15 Of the 6,000-plus that remain open,
16 I know that over 5,000 of them claim to have
17 some type of gynecological cancer that is what
18 some may say are the more compensable cases;
19 right. Which would be ovarian, or fallopian,
20 or peritoneal cancer.
21 And then less than -- I want to say
22 less than a thousand. I don't have an exact
23 number for you. Less than a thousand would be
24 those that are uterine cancer or some other
25 type of cancer that may not be on that list.

Page 22

1 **Q. Okay. Do you have any open**
2 **mesothelioma cases?**
3 A. I think we have two that we are
4 looking at.
5 **Q. All right.**
6 **We're going to come back to some of**
7 **this. But just so that I understand, for the**
8 **closed files, you indicated you looked at**
9 **closed files as well. There are 9,000 closed**
10 **files, approximately?**
11 A. Correct.
12 **Q. And were any of those files closed**
13 **because they were resolved with**
14 **Johnson & Johnson or any of its affiliates?**
15 A. No.
16 **Q. Have you resolved any talcum powder**
17 **related case, regardless of what the injury**
18 **is, with Johnson & Johnson?**
19 A. Depends on what you mean by
20 resolved. Some of our clients are part of
21 Mark Lanier's settlement process. Those are
22 not ones that I'm lead counsel on.
23 At this point, some of them -- and
24 so, I -- they have not been paid yet. They
25 have not been fully satisfied. There is no

Page 23

1 release to sign, to my understanding, at this
2 point.
3 And so, I don't really -- I want to
4 answer your question, but I don't know that --
5 they are in a settlement process but I don't
6 believe they have been resolved.
7 **Q. Have any claims of clients that you**
8 **are lead counsel on, or your firm is lead**
9 **counsel on, been resolved through a resolution**
10 **with Johnson & Johnson or any of its**
11 **affiliates?**
12 A. None.
13 **Q. Okay.**
14 **Did you look at any other**
15 **information in the database other than open**
16 **and closed files?**
17 A. Not particularly.
18 **Q. Okay.**
19 **And with regard to the 6,000-plus**
20 **open files, do you have an understanding as to**
21 **when the files were opened?**
22 A. With respect to the 6,000?
23 **Q. Yes.**
24 A. I would say from 2018 or 2019, to
25 present. No. Probably 2019 to present.

Page 24

1 **Q. Do you have any better**
2 **understanding -- withdrawn.**
3 **Do you have any more specific**
4 **understanding as to when the 6,000-plus files**
5 **were opened?**
6 MS. RASMUSSEN: Objection to the
7 form of the question.
8 THE WITNESS: I'm sorry. Can
9 you repeat the question?
10 BY MR. SILVERSTEIN:
11 **Q. Do you have any more specific**
12 **understanding as to when the 6,000 plus files**
13 **were opened?**
14 MS. RASMUSSEN: Objection to the
15 form of the question.
16 THE WITNESS: I want to answer
17 your question, but I don't really know
18 exactly what you're asking me.
19 But assuming if you're asking me
20 like, how many were open in 2019 and how
21 many were open in 2020 and 2021, I am
22 assuming it was pretty evenly spread out.
23 But I can't tell you exactly that
24 that's the case.
25 BY MR. SILVERSTEIN:

Page 25

1 **Q. And what -- what leads you to assume**
2 **that they were evenly spread out?**
3 MS. RASMUSSEN: Object to form.
4 THE WITNESS: Just from my
5 recollection of us intaking and getting
6 referred cases over the last three years.
7 BY MR. SILVERSTEIN:
8 **Q. Is your recollection that the --**
9 **your firm's inventory grew at approximately**
10 **the same pace, year over year, since you began**
11 **intaking these types of cases?**
12 A. I --
13 MS. RASMUSSEN: Objection to the
14 form of the question.
15 And Adam, may we have an agreement
16 that an objection by one is an objection
17 for all?
18 THE WITNESS: Sure.
19 MR. SILVERSTEIN: Yeah. I think
20 that I would -- I would prefer that.
21 MS. RASMUSSEN: Two Adams here.
22 THE WITNESS: Sorry.
23 MR. SILVERSTEIN: All right.
24 So, we'll just agree that the question is
25 objected to in advance. But I'm going to

Page 26

1 ask it again.
2 BY MR. SILVERSTEIN:
3 **Q. Mr. Pulaski, is it your recollection**
4 **that your firm's inventory of**
5 **Johnson & Johnson cosmetic talcum powder cases**
6 **grew at approximately the same rate, year over**
7 **year, since you began intaking those cases?**
8 A. I can't tell you that they grew at
9 approximately the same rate. But I can tell
10 you that I am unaware of any significant
11 changes or spikes in the number of cases that
12 were coming in over the last three years.
13 **Q. And does your database indicate when**
14 **the file was opened?**
15 A. Yes.
16 **Q. Did you run a report indicating**
17 **the -- the number of Johnson & Johnson**
18 **cosmetic talcum powder cases opened in any**
19 **particular year?**
20 A. Yes.
21 **Q. Have you ever done that?**
22 A. No.
23 **Q. You also indicated that you read 20**
24 **or 30 pages from Mr. Watt's deposition from**
25 **yesterday. What -- in particular, what**

Page 27

1 **testimony did you review?**
2 A. So, honestly, I reviewed the
3 testimony -- probably shouldn't have -- on my
4 phone, while I was driving into the office.
5 So it was sporadic at best, and I kind of just
6 flipped through it.
7 I -- there was testimony about Mikal
8 not being involved over the last months.
9 Because of his absence, there was some
10 testimony about the optimization of the plan,
11 while in his absence.
12 And there was some testimony as it
13 related to his negotiations with Mr. Haas and
14 with JNJ, as it related to the plan itself,
15 and getting to where I guess others began to
16 get involved.
17 **Q. I noticed yesterday -- because I**
18 **listened to the deposition as well -- that**
19 **you -- somebody with your name was logged on.**
20 **Did you sit through the deposition?**
21 A. No. Actually, I turned the
22 deposition on and I was going to listen to it
23 for a minute. I was probably on for five
24 minutes.
25 And I was out of town for work. I

Page 28

1 walked into the meeting and I actually thought
2 I turned the deposition off. And then an hour
3 and a half through my meeting, I realized that
4 there was a noise coming from my pocket and I
5 hadn't disconnected the Zoom.
6 So I was not really on the Zoom, I
7 don't think longer than five minutes.
8 **Q. Where are you today?**
9 A. I'm in my office in Houston.
10 **Q. And where were you yesterday during**
11 **the deposition?**
12 A. I was in Fort Worth.
13 **Q. Okay.**
14 **You also testified that you reviewed**
15 **the Plan Support Agreement. Why did you do**
16 **that?**
17 MS. RASMUSSEN: Objection to
18 form.
19 THE WITNESS: I hadn't looked at
20 it in a while. I probably looked at it
21 for two minutes.
22 BY MR. SILVERSTEIN:
23 **Q. And was there anything in particular**
24 **you were looking at?**
25 A. No. Because I remember that you

Page 29

1 guys asked me in the first deposition about
2 dates and when things were signed. And
3 honestly, I couldn't remember an exact date,
4 and I didn't want to not have an answer for
5 you. And I think it was April 4th that was
6 signed.
7 So, I was looking to see when it was
8 signed.
9 **Q. And you said you reviewed or at**
10 **least looked at the plan that the debtor**
11 **filed?**
12 A. Again, probably for about two
13 minutes.
14 **Q. Was that the first time you had seen**
15 **the plan?**
16 A. No.
17 **Q. And what were you looking at**
18 **yesterday?**
19 A. It was this morning.
20 **Q. I'm sorry. What were you looking at**
21 **this morning?**
22 A. I just flipped through it.
23 **Q. Did you look for, or at, anything in**
24 **particular?**
25 A. I looked at some of the points that

Page 30

1 were allocated for different things and
2 deductions.
3 **Q. And what things are those that you**
4 **looked at?**
5 A. Just the --
6 **Q. With points.**
7 A. -- the four or five pages of charts
8 related to ovarian and mesothelioma claims.
9 **Q. Okay. We'll come to that.**
10 A. Okay.
11 **Q. Who is Lynn Hardiman?**
12 A. I don't know.
13 **Q. Have you met somebody named**
14 **"Lynn Hardiman," to the best of your**
15 **knowledge?**
16 A. No.
17 **Q. Okay. Does the name ring a bell at**
18 **all?**
19 MS. RASMUSSEN: Object to the
20 form.
21 THE WITNESS: No.
22 MR. SILVERSTEIN: Okay.
23 I'm going to ask the court reporter
24 to mark as Pulaski Exhibit 1, a document
25 that I'm going to ask Lexitas to please

Page 31

1 pull up. It's tab two.
2 (Exhibit 1 marked for identification)
3 BY MR. SILVERSTEIN:
4 **Q. This is a document entitled "Master**
5 **Creditors List." I can represent to you,**
6 **Mr. Pulaski, that it was filed on the docket**
7 **by the debtor on the first day of its first**
8 **bankruptcy filing, in North Carolina, on**
9 **October 14th 2021.**
10 It's a voluminous document. I'm
11 going to refer you to specific pages. I can
12 have Lexitas scroll down if you'd like. But
13 just from looking at the first page, can you
14 tell whether you've seen this document before?
15 A. I don't recall if I've seen the
16 document or not, but I probably have seen it.
17 **Q. All right.**
18 Do you have an understanding that --
19 that LTL, in its two bankruptcy cases, has
20 filed lists of claimants, of which it is where
21 in connection with its reporting
22 responsibilities to the Bankruptcy Court?
23 A. Yes.
24 **Q. And have you reviewed any of those**
25 **lists or schedules?**

Page 32

1 A. If I have, it hasn't been recently.
2 And I don't recall.
3 **Q. All right.**
4 Well, I can represent to you that
5 this is a -- a searchable document. And I can
6 also represent to you that when you search the
7 word, "Ashcraft," there are 1,907 hits. When
8 you search the word, "Beasley," there are
9 4,916 hits.
10 When you search the word, "Golomb,"
11 G-O-L-O-M-B, there are 993 hits. And when you
12 search the word, "Pulaski," there are three
13 hits. Including the name, Michelle Pulaski;
14 Adam Pulaski; and the Pulaski law firm.
15 MR. SILVERSTEIN: So I'm going
16 to, with that representation now, ask
17 Deane to scroll down the page 814 of this
18 PDF.
19 BY MR. SILVERSTEIN:
20 **Q. And, Mr. Pulaski, in the third**
21 **column, eight entries down, you'll see the**
22 **name, "Lynn Hardiman, Pulaski Law Firm."**
23 Do you see that?
24 A. Yes.
25 **Q. Okay.**

Page 33

1 **And, Mr. Pulaski, I can represent to**
2 **you that Ms. Hardiman is the only claimant**
3 **identified in this Master Creditors List as**
4 **having been represented by your law firm,**
5 **based on a search of the word, "Pulaski."**
6 **Is that -- is that consistent with**
7 **your recollection that as of October 14th**
8 **2021, your firm had one filed cosmetic talcum**
9 **powder case against Johnson & Johnson or its**
10 **affiliates?**
11 MS. RASMUSSEN: Objection to
12 form.
13 MR. MONTEFUSCO: Objection to
14 the form of the question.
15 THE WITNESS: Well, we had
16 thousands filed through other firms with
17 Beasley Allen with joint ventures. But
18 particularly with my firm as lead counsel,
19 I believe we had a handful.
20 If it was one, two, or three, I
21 don't recall.
22 BY MR. SILVERSTEIN:
23 **Q. Do you have any reason to believe it**
24 **was more than one?**
25 A. I can't answer that question right

Page 34

1 now. I just don't know.
2 **Q. Do you have any reason to believe**
3 **that the debtor's records regarding cases**
4 **filed by your firm against Johnson & Johnson**
5 **or any of its affiliates were incomplete or**
6 **inaccurate?**
7 A. No.
8 **Q. Do you accept the debtor's schedule**
9 **reflecting that there was one cosmetic talcum**
10 **powder case filed by your firm, as of**
11 **October 14th 2021, of which the debtor was**
12 **aware?**
13 MR. MONTEFUSCO: Objection to
14 form.
15 MS. RASMUSSEN: Objection to the
16 form of the question.
17 THE WITNESS: I can't tell you
18 what they were aware of or not aware of.
19 And if you are showing me there's one on
20 here and that's what they are saying they
21 were aware of, then I guess the document
22 speaks for itself.
23 BY MR. SILVERSTEIN:
24 **Q. And do you have any reason to**
25 **dispute any of the information that is set**

Page 35

1 **forth in Pulaski Exhibit 1?**
2 MR. MONTEFUSCO: Objection to
3 form. Asked and answered.
4 THE WITNESS: I can't answer
5 your question, because I'd have to go look
6 into the database and have someone pull
7 information and tell you whether or not.
8 I can tell you it's -- like I said,
9 at most, we had a handful of cases filed.
10 BY MR. SILVERSTEIN:
11 **Q. Are you able to identify any case,**
12 **as you sit there today, that was filed as of**
13 **October 14th 2021, relating to cosmetic**
14 **talcum powder, other than this one for**
15 **Ms. Hardiman identified on Pulaski Exhibit 1?**
16 A. As I sit here right this second?
17 **Q. Yes.**
18 A. No. Not without looking for it.
19 **Q. And you could do a search in your**
20 **data -- withdrawn.**
21 **Could you do a search in your**
22 **database to determine how many cases were**
23 **filed as of October 4th -- 14th 2021?**
24 A. Yeah. I'd probably get my IT guy to
25 do that; but yeah.

Page 36

1 MR. SILVERSTEIN: All right,
2 Deane. You can pull that down.
3 I'm going to ask Lexitas to put up
4 on the screen, and to mark as Pulaski
5 Exhibit 2, what Lexitas has as tab four.
6 (Exhibit 2 marked for identification)
7 BY MR. SILVERSTEIN:
8 **Q. And, Mr. Pulaski, I can represent to**
9 **you that this is a document entitled**
10 **"Schedules of Assets and Liabilities for LTL**
11 **Management LLC," that the debtor filed on the**
12 **docket of the first bankruptcy filing, as**
13 **docket number 450 -- I'm sorry. This is --**
14 **all right. We'll use this document, then.**
15 **This will be Exhibit 2, as for -- in**
16 **the second bankruptcy filing on May 5th**
17 **2023. Again, Mr. Pulaski, I can represent**
18 **this is a -- a searchable document.**
19 MR. SILVERSTEIN: I'm going to
20 ask Lexitas to go to page 95. And this is
21 the first page of Schedule E/F part two.
22 A list of creditors who have non-priority
23 unsecured claims, filed by LTL on
24 May 5th 2023.
25 I'm going to ask Lexitas to please

Page 81

1 confidential at this time, because they
2 were part of our confidential
3 discussions.
4 But over the last week, there may
5 have been some additional discussions
6 that I was not a part of, because I've
7 been tied up on some other matters.
8 BY MR. SILVERSTEIN:
9 **Q. Is it fair that when you signed the**
10 **Plan Support Agreement, you understood that**
11 **you were only agreeing to recommend to your**
12 **clients support for a debtor plan, after it**
13 **was satisfactorily negotiated to your and the**
14 **other plan support signatories' satisfaction?**
15 A. Yeah. Let me --
16 MS. RASMUSSEN: Objection to the
17 form of the question.
18 THE WITNESS: Let me rephrase
19 it. Right.
20 It is -- it was my intention, when I
21 signed this agreement, to suggest to my
22 clients to support the plan. And that is
23 still my intention.
24 And throughout this process, we have
25 been negotiating and -- through our

Page 82

1 attorneys, who have been doing a great
2 job working with Jones Day, have been
3 negotiating changes within the plan.
4 And I am confident that I will not
5 change my opinion that my clients should
6 support the plan.
7 MR. SILVERSTEIN: All right.
8 Let's pull this down and look at the
9 plan. Let's have the court reporter mark
10 as Exhibit 6, and ask Lexitas to pull up
11 its tab eight.
12 (Exhibit 6 marked for identification)
13 BY MR. SILVERSTEIN:
14 **Q. This is a document entitled "Chapter**
15 **11 Plan of Reorganization of LTL Management**
16 **LLC," filed on May 15th 2023.**
17 **This is a document that you skimmed**
18 **in preparation for your deposition today?**
19 A. I did.
20 **Q. Have you read it previously?**
21 A. I have read it previously. I have
22 not read it recently.
23 **Q. And you read it --**
24 A. Except for today.
25 **Q. Have you read it in its entirety?**

Page 83

1 A. I believe so.
2 **Q. Have you read it --**
3 A. I may have skipped the table of
4 contents.
5 **Q. Have you read it more than once?**
6 A. I have read the plan after filing at
7 least once. And before filing, I obviously
8 looked at the Plan Support Agreement that we
9 had signed.
10 **Q. Have you discussed the plan with**
11 **anybody?**
12 A. I'm sure I have.
13 **Q. Has anybody discussed with you what**
14 **your clients would receive monetarily under**
15 **the plan?**
16 MR. HOFMEISTER: Objection, to
17 the extent it involves any privileged
18 discussions with the mediators.
19 Otherwise, you can answer.
20 MR. SILVERSTEIN: Well, let's
21 start with yes or no.
22 BY MR. SILVERSTEIN:
23 **Q. Has anybody discussed with you what**
24 **your clients should expect under the plan?**
25 MS. RASMUSSEN: Objection to the

Page 84

1 form of the question.
2 THE WITNESS: Yeah.
3 I can't answer the question the way
4 you phrased it. I think if you just try
5 and give me a little bit more specifics,
6 I'm happy to answer it.
7 I just don't really know how to
8 answer that.
9 BY MR. SILVERSTEIN:
10 **Q. Have you had any discussions with**
11 **anybody regarding the range of compensation**
12 **that your clients -- open clients in your**
13 **inventory would receive under this plan?**
14 MS. RASMUSSEN: Objection to the
15 form of the question.
16 THE WITNESS: Let me answer it
17 this way. I haven't had any discussion
18 with anybody as it relates to a specific
19 dollar amount that any one of my clients
20 would have received.
21 I have had discussions with those on
22 the ad hoc committee, without breaching
23 any confidentiality or anything else,
24 or -- you know, and -- and discussions
25 throughout negotiations regarding what's

<p style="text-align: right;">Page 89</p> <p>1 women that we represent; their injuries; 2 what they have claimed; looking at cases 3 as medical records come in. 4 Again, going back to the fact that 5 we closed 9,000 cases and we have 6,000 6 still open, it's a testament to the fact 7 that we have been reviewing these and 8 filtering out cases that we just don't 9 believe, in good faith, that we can 10 pursue. 11 BY MR. SILVERSTEIN: 12 Q. Do you have any understanding how 13 much a point under this plan is worth? 14 A. My understanding is it's somewhere 15 between 58 cents and two dollars. And I can 16 tell you that, you know, that's part of our 17 discussions. Part of our discussion has to do 18 with the points and issues we have with 19 deductions for certain things. 20 Again, things that I believe that 21 after negotiations will be changed and will be 22 for the better. 23 Q. So without disclosing anything 24 specific, is it correct that the amount of 25 compensation that claimants would receive is</p>	<p style="text-align: right;">Page 91</p> <p>1 MR. SILVERSTEIN: All right. 2 I'm going to pass the witness on now to 3 Mr. Golomb. 4 THE WITNESS: Thank you. 5 MR. SILVERSTEIN: Thank you, 6 Mr. Pulaski. 7 EXAMINATION BY MR. GOLOMB: 8 Q. Good morning, Adam. 9 A. Good morning. 10 Q. I represent Brandy Carl, who is a 11 member of the TCC, and I'm a TCC 12 representative. 13 Did you read Jim Onder's testimony 14 last week? 15 A. I did not. 16 Q. Okay. Jim testified that his 17 understanding was that if it was a dollar a 18 point, that the average case value under this 19 deal was \$114,000 a case. 20 Is that consistent with your 21 understanding? 22 A. That would be kind of "averagey." 23 Yes. 24 Q. What do you mean it would be kind of 25 "averagey?"</p>
<p style="text-align: right;">Page 90</p> <p>1 being -- is one of the things that's being 2 negotiated right now? 3 MR. HOFMEISTER: Objection, to 4 the extent it involves the disclosure of 5 any privileged or other communications 6 that are covered by any discussions with 7 the committee -- ad hoc committee, or 8 during mediation. 9 Otherwise, you can answer. 10 THE WITNESS: Again, I don't 11 want to get into specifics of what's being 12 discussed. I can just tell you that they 13 are -- and it's not to say that JNJ would 14 agree to everything that we're asking for. 15 But there are certain items in there, that 16 we are bringing up to them. 17 BY MR. SILVERSTEIN: 18 Q. When was the last time there was 19 a -- don't tell me what was said, but when was 20 the last time there was a negotiating session 21 with JNJ over the plan? 22 A. It is ongoing. I have been out of 23 town this week, and my recollection is, we had 24 a Zoom sometime last week. Or there were 25 discussions sometime last week.</p>	<p style="text-align: right;">Page 92</p> <p>1 A. I mean, I don't -- I don't think 2 that we can predict an exact dollar amount 3 without knowing the exact number of people 4 that are going to be involved. 5 And I think we have estimates based 6 on years of gathering information and going 7 back as far as when I was in discussions with 8 Beasley Allen and JNJ, polling literally over 9 firm in the country to figure out how many 10 cases there were, and everything else. 11 And so, as I sit here today, I can't 12 tell you if \$114 is -- I mean, if \$114,000 is 13 the right number. 14 Q. Okay. 15 And you get a lot of information out 16 of Needles of your case management system. 17 Correct? 18 A. I do. Yes. 19 Q. All right. 20 And so, you can do reports out of 21 Needles, that show as an example, how many 22 cases of yours were ovarian cancer cases. 23 Right? 24 A. Again, depending upon where the 25 information came from, right now, the data is</p>

<p style="text-align: right;">Page 93</p> <p>1 stored in multiple different places within --</p> <p>2 and depending upon where the data came from.</p> <p>3 If it came from a medical record</p> <p>4 that we review in-house. A medical record</p> <p>5 that was reviewed by a nurse paralegal. A</p> <p>6 death certificate, or different places.</p> <p>7 Some of them are in note fields,</p> <p>8 where it's not easy to sort. All right?</p> <p>9 Because it's not a check box. Some of it's in</p> <p>10 check boxes. Some of it's in different</p> <p>11 places.</p> <p>12 So the bottom line answer is the</p> <p>13 data is within the database. Pulling the</p> <p>14 report is not as easy as just pressing a</p> <p>15 button.</p> <p>16 Q. By the way, when Adam Silverstein</p> <p>17 went through with you the list of your cases</p> <p>18 and he asked you about Lynn Hardiman; do you</p> <p>19 recall that?</p> <p>20 A. I do.</p> <p>21 Q. When he shared that, I had noticed</p> <p>22 that Lynn Hardiman was there twice. Was</p> <p>23 under -- one was under your firm and the other</p> <p>24 was under Seeger Weiss.</p> <p>25 Did you happen to notice that?</p>	<p style="text-align: right;">Page 95</p> <p>1 specifically screen all of our clients and</p> <p>2 discuss that with them on the first several</p> <p>3 phone calls, whether or not they have hired</p> <p>4 other law firms.</p> <p>5 To tell you whether or not do I have</p> <p>6 any other cases that are represented by other</p> <p>7 firms, at this time, if there are any, we have</p> <p>8 already dealt with them that we know of.</p> <p>9 And if there is any that we don't</p> <p>10 know of, obviously, I don't know of them at</p> <p>11 this point.</p> <p>12 Q. When you say you dealt with, how do</p> <p>13 you deal with it?</p> <p>14 A. If we have a client that has hired</p> <p>15 two firms, typically, I'll get on the phone</p> <p>16 with the client and then I'll get on the phone</p> <p>17 with the other firm, and we will try to work</p> <p>18 something out where we are both not working on</p> <p>19 the same case.</p> <p>20 And one firm may take lead or just</p> <p>21 take control of the litigation. And we would</p> <p>22 inform the client and discuss it with the</p> <p>23 client and move from there.</p> <p>24 Q. Okay.</p> <p>25 Correct me if I'm wrong. You</p>
<p style="text-align: right;">Page 94</p> <p>1 A. I did notice that.</p> <p>2 Q. What, if anything, did you do, or</p> <p>3 has your office done, to make sure that none</p> <p>4 of your 6,200 or so cases are duplicates of</p> <p>5 what other firms also have?</p> <p>6 A. I can tell you that my firm</p> <p>7 probably, more than almost any other firm in</p> <p>8 the country, were very diligent in determining</p> <p>9 whether or not we -- we sent videos out to our</p> <p>10 clients -- I don't know that we have done it</p> <p>11 in the talc case recently. It's kind of hard</p> <p>12 since none of the cases have been able to be</p> <p>13 filed over the last two years.</p> <p>14 But, for instance, in other dockets,</p> <p>15 you know, we are constantly asking our clients</p> <p>16 to let us know if they have talked to any</p> <p>17 other law firm; spoken to any other law firm;</p> <p>18 sent information to any other law firm; hired</p> <p>19 any other law firm.</p> <p>20 So that internally, we can deal with</p> <p>21 an issue before it becomes a problem where we</p> <p>22 have all worked on a case for three years and</p> <p>23 we have wasted our time and money.</p> <p>24 So, to answer your question, in</p> <p>25 general, we are sending emails. We</p>	<p style="text-align: right;">Page 96</p> <p>1 indicated earlier in your deposition -- and</p> <p>2 I'm not going to -- I may drill down on some</p> <p>3 things but I'm not going to repeat.</p> <p>4 A. That's fine.</p> <p>5 Q. I think you said earlier in your</p> <p>6 deposition that you signed up your first --</p> <p>7 your first case that you kept, in-house, in</p> <p>8 2019.</p> <p>9 Is that right?</p> <p>10 A. I believe that is the case.</p> <p>11 Q. Right. When did you first -- when</p> <p>12 did you sign up your first talc case?</p> <p>13 A. I want to say it was 2015 or 2016.</p> <p>14 Q. Okay.</p> <p>15 And so, between 2015 and 2019,</p> <p>16 that's when you -- you got these four to five</p> <p>17 thousand cases that you referred to Beasley</p> <p>18 Allen and others?</p> <p>19 A. Yeah. We had a joint venture</p> <p>20 agreement with Beasley Allen on -- and I know</p> <p>21 this, because I just happened to see it as I</p> <p>22 was pulling numbers up this morning -- on some</p> <p>23 fifteen to eighteen hundred cases, of which I</p> <p>24 think 900-plus are still open in Beasley</p> <p>25 Allen's office and the rest are closed.</p>